

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

E. JEAN CARROLL,

*Plaintiff,*

v.

DONALD J. TRUMP,

*Defendant.*

No. 20 Civ. 7311 (LAK)

**STIPULATION AND [PROPOSED] ORDER**

Pursuant to Your Honor's Individual Rules of Practice, Plaintiff E. Jean Carroll and Defendant Donald J. Trump, by their undersigned counsel and subject to the approval of the Court, enter into the following Stipulation and Proposed Order:

WHEREAS on March 5, 2024, Mr. Trump filed motions for judgment as a matter of law and for a new trial. *See* ECF 309, 311;

WHEREAS under Your Honor's Individual Rules of Practice, Ms. Carroll's deadline to respond to both motions is March 19, 2024;

WHEREAS the parties have met and conferred regarding Ms. Carroll's request to extend to March 26, 2024 the deadline for responding to both motions;

WHEREAS Ms. Carroll requested this extension due to the diversion of attention caused by the need to respond to Mr. Trump's motions to stay execution of judgment, ECF 286, and to approve supersedeas bond, ECF 317, as well as by the March 20, 2024 deadline that the Second Circuit has established for Ms. Carroll's appellee brief in *Carroll II*, *see Carroll v. Trump*, No. 23-793 (2d Cir.), ECF 105;

WHEREAS Mr. Trump consents to Ms. Carroll's request and has sought a reciprocal one-week extension on his reply deadline, to which Ms. Carroll has consented;

WHEREAS Ms. Carroll maintains that a one-time, single-week extension of the deadlines is consistent with ensuring an expeditious resolution of Mr. Trump's post-trial motions.

IT IS ACCORDINGLY STIPULATED AND AGREED that Ms. Carroll's deadline for responding to Mr. Trump's motions for judgment as a matter of law and for a new trial are extended to March 26, 2024, and Mr. Trump's deadline for submitting a reply in support of those motions is extended to April 9, 2024.

Dated: March 13, 2024

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